

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PATRICIA FELKNER-ELLIOTT,
Plaintiff,
v.
P.F. CHANG'S CHINA BISTRO, INC.,
Defendant.

Case No.: 3:24-cv-00160-ART-CLB

ORDER GRANTING

**STIPULATION TO EXTEND
CLOSE OF DISCOVERY
DEADLINE ONLY**

Plaintiff PATRICIA FELKNER-ELLIOTT by and through her counsel of record, ROBERT R. JENSEN, ESQ. and CODY M. OLDHAM, ESQ., of JENSEN PERSONAL INJURY LAW, LLC., and Defendant PF CHANG'S CHINA BISTRO, INC., by and through their counsel of record KIMBERLY A. NELSON, ESQ., of WILSON ELSEER MOSKOWITZ EDELMAN & DICKER, LLP., submit the following Stipulation to Extend Close of Discovery Deadline Only.

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1 **A. REASON FOR THE REQUESTED EXTENSION OF DISCOVERY**

2 The parties have already conducted initial and supplemental discovery in this
3 case, including the production of documents and witnesses. However, the current
4 discovery deadline is insufficient to complete the necessary depositions. The parties
5 have worked together to coordinate the depositions of seven (7) witnesses to the
6 alleged incident. However, there are estimated to be twelve (12) more depositions of
7 alleged witnesses and managers who were employed at the time of the incident
8 referenced in the complaint.
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10 The parties now jointly request an extension of only the discovery deadline
11 90 days past their currently scheduled date. This continuance is not sought for the
12 purposes of delay or for any other untoward purpose. This extension will **not** affect
13 any of the remaining deadlines.

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B. PROPOSED NEW CLOSE OF DISCOVERY DEADLINE

Current Discovery Deadline: April 7, 2025

Proposed Discovery Deadline: July 7, 2025

RESPECTFULLY SUBMITTED BY:

Dated this 4th day of February, 2025.

Dated this 4th day of February, 2025.

JENSEN PERSONAL INJURY LAW

WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP

/s/ Robert R. Jensen


/s/ Kimberly A. Nelson

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ORDER

IT IS SO ORDERED this 4th day of February, 2025.


UNITED STATES MAGISTRATE JUDGE